

**REMARKS**

Reconsideration and withdrawal of the rejections set forth in the Office Action are respectfully requested in view of this amendment and the following reasons. By this amendment, claims 1-4 have been amended. Accordingly, claims 1-4 are pending in this application.

Claims 1-4 have been amended to recite the subject matter more clearly.

Support for these features may be found in the present application at least at page 6, lines 17-20 (for “connected via a serial bus conforming to IEEE 1394” recited in claims 1 and 3); at page 13, lines 6-8 (for the “control apparatus provides the plurality of target apparatuses with data of image and audio via the serial bus” recited in claims 1 and 3); at page 9, line 33-page 10, line 7, page 12, lines 25-34, and page 13, lines 23-31 (for “simultaneously establishing a data transmission route between the control apparatus and each of all the selected recording subunits by using an interface conforming to IEEE 1394 when the simultaneous recording is selected by said recording subunit selection step, and sequentially establishing a data transmission route between the control apparatus and one selected recording subunit by using the interface conforming to IEEE 1394 and establishing a data transmission route between the control apparatus and another selected recording subunit each time a recording by the one selected recording subunit is finished when the continuous recording is selected” recited in claims 1 and 3); and at page 10, lines 5-7 and page 12, lines 32-34 (for “transmission route establishment means or step establishes a point-to-point connection for the data transmission route” recited in claims 2 and 4).

It is respectfully submitted that the above amendments introduce no new matter within the meaning of 35 U.S.C. §132.

Entry of the Amendment is proper under 37 C.F.R. §1.111 because it places the application in *prima facie* condition for allowance for the reasons discussed herein. For at least these reasons, entry of the present Amendment is therefore respectfully requested. Accordingly, Applicant requests reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

***Rejections Under 35 U.S.C. §103***

Claims 1-4 stand rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over U.S. Patent No. 5,877,906 issued to Nagasawa et al. (“Nagasawa”) in view of U.S. Patent No. 6,311,011 issued to Kuroda (“Kuroda”).

To establish an obviousness rejection under 35 U.S.C. § 103(a), four factual inquiries must be examined. The four factual inquiries include (a) determining the scope and contents of the prior art; (b) ascertaining the differences between the prior art and the claims in issue; (c) resolving the level of ordinary skill in the pertinent art; and (d) evaluating evidence of secondary consideration. *Graham v. John Deere*, 383 U.S. 1, 17-18 (1966). In view of these four factors, the analysis supporting a rejection under 35 U.S.C. 103(a) should be made explicit, and should “identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the [prior art] elements” in the manner claimed. *KSR Int’l. Co. v. Teleflex, Inc.*, 550 U.S. \_\_\_, slip op. at 14-15 (2007). Furthermore, even if the prior art may be combined, there must be a reasonable expectation of success, and the reference or references, when combined, must disclose or suggest all of the claim limitations. See *in re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

In this framework, Applicant respectfully submits that neither Nagasawa nor Kuroda disclose or suggest all of the limitations of claim 1.

Specifically, Nagasawa does not disclose, teach, or suggest a “plurality of target apparatuses via a serial bus conforming to IEEE 1394 and providing the plurality of target apparatuses with data of image and audio via the serial bus,” as recited in claim 1 (emphasis added). In the present application, the external recording apparatuses specifically described in the specification, page 7, line 20-page 8, line 3 are examples of the target apparatuses. Here, an operator can select any recording subunits on which data is to be recorded even when selecting simultaneous recording, as supported by the specification, page 8, line 32-page 9, line 13, and Fig. 6. A data transmission route between the control apparatus and each selected recording

subunit is established by using an interface conforming to IEEE 1394, as also supported by the specification, page 9, line 33-page 10, line 18 and page 12, line 25-page 13, lines 31. In contrast, Nagasawa teaches an apparatus (camcorder) for recording data, on a real-time basis, onto a recording medium such as a DVC, a HDD and so forth. However, Nagasawa does not teach or suggest a plurality of target apparatuses, e.g., external recording apparatuses, connected to a control apparatus *via a serial bus conforming to IEEE 1394*, as required by claim 1.

Furthermore, Nagasawa fails to disclose, teach, or suggest a “recording subunit selection means for accepting *a selection of recording subunits, on which the data is to be recorded, from the list of recording subunits displayed on the screen by said recording subunit display means,*” as recited in claim 1 (emphasis added). Thus, Applicant respectfully disagrees with the Office Action’s conclusion that Nagasawa discloses claim 1’s recording subunit selection means because Nagasawa discloses merely the determination of the recording tape transport (*See, Nagasawa, Col. 7, lines 46-52*).

Even furthermore, Nagasawa fails to disclose, teach, or suggest a “transmission route establishment means for *simultaneously establishing a data transmission route between the control apparatus and each of all the selected recording subunits by using an interface conforming to IEEE 1394 when the simultaneous recording is selected through said recording subunit selection means, and sequentially establishing a data transmission route between the control apparatus and one selected recording subunit by using the interface conforming to IEEE 1394 and establishing a data transmission route between the control apparatus and another selected recording subunit each time a recording by the one selected recording subunit is finished when the continuous recording is selected through said recording subunit selection means,*” as recited in claim 1 (emphasis added). Notwithstanding that Nagasawa discloses either mode of the simultaneous or continuous recording modes can be selected, Nagasawa yet fails to teach or suggest how the connection is carried out (establishment of a data transmission route), and thus, fails to teach or suggest that a data transmission route is established by using an interface conforming to IEEE 1394.

Kuroda fails to cure the deficiencies of Nagasawa noted above. Specifically, Kuroda does

not teach the a plurality of target apparatuses connected to a control apparatus via a serial bus conforming to IEEE 1394, selection of recording subunits, nor establishment of a data transmission route according to claim 1.

Because neither Nagasawa nor Kuroda discloses all of the recited features, claim 1 is not obvious over the cited references, whether taken alone or in combination.

Claim 3 has similar features as claim 1, and thus, is allowable for at least this reason.

Claims 2 and 4 depend from claims 1 and 3, respectively, and thus, are allowable for at least this reason. Furthermore, claims 2 and 4 require that *a point-to-point connection* for the data transmission route be established. However, neither Nagasawa nor Kuroda disclose, teach, or suggest this feature of claims 2 and 4. Accordingly, claims 2 and 4 are not obvious over the references.

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of claims 1-4. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed subject matter, Applicant respectfully submits that independent claims 1 and 3, and all the claims that depend therefrom, are allowable.

**CONCLUSION**

Applicant believes that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated grounds for rejection have been overcome or rendered moot. Accordingly, Applicant respectfully submits that all pending claims are allowable and that the application is in condition for allowance.

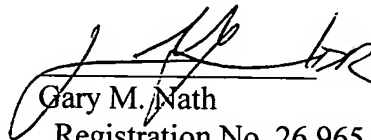
Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicant's undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,  
**THE NATH LAW GROUP**

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